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18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 MAIN SEQUENCE, LTD.,
21 JEROLD HAMZA as executor for the
22 ESTATE OF GEORGE CARLIN, and
23 JEROLD HAMZA in his individual
24 capacity,

25 Plaintiffs,

26 v.

27 DUDESY, LLC, WILL SASSO, CHAD
28 KULTGEN, and JOHN DOES 1-20,
Defendants.

Case No. 2:24-cv-00711-MEMF-E

**PLAINTIFFS' REQUEST FOR
EXTENSION OF TIME TO FILE
STIPULATION OF DISMISSAL**

1 On April 2, 2024, the Parties entered into and filed a Joint Stipulation for Entry
2 of Consent Judgment and Permanent Injunction [Dkt. 22], and on June 18, 2024,
3 this Court entered and so-ordered a Stipulated Consent Judgment and Permanent
4 Injunction [Dkt. 23] (“June 18, 2024 Order”).

5 As part of the June 18, 2024 Order, this Court directed the parties to file
6 “either (1) a stipulation and proposed order for dismissal of the action or judgment,
7 or (2) a motion to reopen if needed.” The deadline set in the June 18, 2024 Order
8 to make the aforementioned filing is July 18, 2024.

9 Plaintiffs have worked diligently to prepare an appropriate filing. However,
10 due to the July 4 federal holiday and conflicting travel schedules, Plaintiffs,
11 Plaintiffs’ counsel, and Defendants have not yet been able to agree on the final
12 language for any such filing. Additionally, Plaintiffs are still considering the
13 appropriate course of action with respect to third parties that may be misusing the
14 “Dudesy Special”—something that Plaintiffs and their counsel have had little time
15 to fully discuss due to the aforementioned holiday and scheduling troubles.

16 As a result, Plaintiffs’ respectfully request an additional fourteen days, up to
17 and including August 1, 2024, within which to file “a stipulation and proposed order
18 for dismissal of the action or judgment,” as ordered by the Court in its June 18, 2024
19 Order [Dkt. 23]. This additional time shall provide the parties in this matter an
20 opportunity to finalize an appropriate filing pursuant to the June 18, 2024 Order.

21 On July 17, 2024, Defendants informed Plaintiffs that they did not object to
22 Plaintiffs filing this request and agreed to requesting the 14-day extension of the
23 June 18, 2024 Order deadline. This is the first such request by any of the parties in
24 this litigation. Additionally, because Defendants have previously consented to the
25 entry of and are subject to the judgment and permanent injunction [Dkt. 22], the
26 requested continuation of the June 18, 2024 Order deadline would not prejudice
27 Defendants.

Respectfully submitted,

Dated: July 17, 2024

BOIES SCHILLER FLEXNER LLP

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